

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-226-E**

In re:

South Carolina Energy Freedom Act
(House Bill 3659) Proceeding Related
to S.C. Code Ann. Section 58-37-40 and
Integrated Resource Plans for Dominion
Energy South Carolina, Incorporated

PETITION TO INTERVENE

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On February 28, 2020, Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) filed its 2020 Integrated Resource Plan with the Public Service Commission of South Carolina (“Commission”).
2. Sierra Club is a nonprofit conservation organization incorporated in California. It currently represents almost 800,000 dues-paying members nationwide and approximately 6,920 dues-paying members in South Carolina. The Club’s mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth’s ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, the Sierra Club and the Sierra Club’s South Carolina Chapter work to accelerate the transition from fossil fuels to clean energy solutions and advocate for state and

federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

3. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, Docket Nos. 2018-322-E, 2018-321-E, 2018-319-E, 2018-318-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

4. Sierra Club and its more than 6,920 members who live in South Carolina— many of which are Dominion customers—have a direct and substantial interest in this proceeding, because they will be directly impacted by Dominion’s integrated resource planning and the costs associated with implementing that plan.

5. Dominion’s IRP should include: a 15 year demand and energy forecast; a discussion of the adequacy and capacity to serve anticipated peak electrical load with planning reserve margins; consumer affordability and least cost; compliance with state and federal environmental regulations; power supply reliability; commodity price risks; diversity of generation supply; and other foreseeable conditions that may be of the public interest. S.C. Code § 58-37-40 (2).

6. Sierra Club and its members have an interest in ensuring that the approved IRP advances the important objectives of promoting cost-saving clean energy, efficiencies and distributed generation, while avoiding disproportionate and unreasonable burdens on low-income South Carolinians. No other party will adequately represent Sierra Club’s interests in this case.

7. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission’s decision-making process

regarding the Company's Integrated Resource Planning. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest to reduce pollution from coal-fired and other fossil-fueled power plants and to promote not only clean energy sources in the Southeast but also to increase Dominion's portfolio of supply-side and demand-side resources.

8. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

9. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:

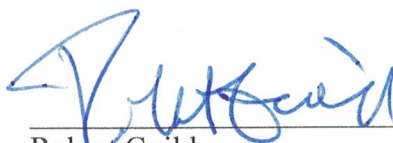
Robert Guild
314 Pall Mall Street
Columbia, SC 29201
Tel: (803) 917-5738
Email: bguild@mindspring.com

10. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record and:

Dori Jaffe (Pro Hac Vice status pending)
50 F St NW, 8th Floor
Washington, DC 20001
Tel: (202) 675-6275
Email: dori.jaffe@sierraclub.org

WHEREFORE, Petitioner prays that it be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this 24th day of March, 2020.



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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2018-318-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic mail on this day, March 24, 2020.

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